

Kevin R. McCarthy, VSB No. 14273  
1751 Pinnacle Drive, Suite 1115  
McLean, VA 22102  
703-770-9261 (Telephone)  
703-770-9263 (Facsimile)  
[krm@mccarthywhite.com](mailto:krm@mccarthywhite.com)

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

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In re:	*	
	*	
EQUAPHOR, INC.	*	Case No. 10-20490-SSM
	*	(Chapter 7)
Debtor(s).	*	

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TRUSTEE'S MOTION TO SHORTEN TIME TO OBJECT TO  
HIS MOTION TO APPROVE SALE OF PROPERTY OF THE ESTATE  
AT PUBLIC AUCTION DURING COURT HEARING

Kevin R. McCarthy, Trustee, moves the Court under Federal Rules of Bankruptcy Procedure 2002(a)(2) and 9006(c) to shorten the time for any party in interest to object to the Trustee's Motion To Approve Sale Of Property Of The Estate At Public Auction During Court Hearing ("Motion") from twenty-one days to a period ending at 9:30 a.m. on June 9, 2011.<sup>1</sup> The reason for this Motion is the need to conduct a sale of the Debtor's intellectual property at public auction prior to a lifting of the automatic stay of certain litigation affecting such property, namely, Carotek, Inc. v. Kobayashi Ventures, LLC et al., Civil No. 1:07-cv-11163-NRB; Event Capturing System, Inc. v. Kobayashi Ventures, LLC et al., Civil No. 1:08-cv-5706-NRB (consolidated) (the "New York Litigation"). A motion to lift the automatic stay in the New York Litigation has been pending since January 21, 2011. The Court has continued the hearing on the lift stay motion several times in order to allow the Trustee to sell the Debtor's intellectual

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<sup>1</sup> The Motion was filed and served on May 20, 2011, as required by the Court at

property, has set aside June 9, 2011 at 9:30 a.m. as the date and time for a public auction of such property, and has continued the pending lift stay motion to the same date and time.

Wherefore, Kevin R. McCarthy, Trustee, requests the Court to enter the attached proposed Order.

Respectfully submitted,

/s/ Kevin R. McCarthy  
Kevin R. McCarthy, VSB No. 14273  
McCarthy & White, PLLC  
1751 Pinnacle Drive – Suite 1115  
McLean, VA 22102  
(703) 770-9261 (phone)  
(703) 770-9263 (fax)  
krm@mccarthywhite.com (e-mail)  
Attorneys for Trustee

#### CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of May, 2011 I served a copy of the foregoing, including the attached proposed Order, through the court's ecf system on all registered ecf participants who have appeared in this case.

/s/ Kevin R. McCarthy  
Kevin R. McCarthy